## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA SOUTHERN DIVISION

**UNITED STATES OF** AMERICA,

V.

**CASE NUMBER** 

2:06-CR-169-WHA

CHRISTOPHER IMAN ULMER, **DEFENDANT.** 

## MOTION FOR REIMBURSEMENT OF **COPY EXPENSE**

**COMES NOW** the defendant, Christopher Iman Ulmer, by and through the undersigned counsel and respectfully requests this Honorable Court to allow counsel for this indigent Defendant to be reimbursed for expenses incurred when discovery was obtained in this matter by stating the following:

- 1. Discovery in this sixteen (16) defendant case is voluminous and consist of the following:
  - a) 10 DVD's
  - b) 19 CD's
  - c) 1 Floppy Disc
  - d) 6 VHS Videos
  - e) 23 Audio Cassette Tapes and
  - f) 7,428.00 paper copies

- 2. The United States Attorney's Office made discovery available in this case through the services of ProLegal Copies of Montgomery, Inc. at the expense of the Defendant.
- 3. Defendant, Christopher Ulmer obtained a complete set of discovery costing the undersigned a total of \$1,234.35. (See attached Exhibit A)

WHEREFORE the premises considered, the Defendant prays that this Honorable Court ill issue and Order allowing

**RESPECTFULLY SUBMITTED** this the 26th day of March, 2007.

### /s/ Daniel G. Hamm

DANIEL G. HAMM (HAM043) ATTORNEY FOR THE DEFENDANT 560 S. McDonough St., Ste. A MONTGOMERY, ALABAMA 36104 TELEPHONE 334-269-0269 FAX 334-323-5666

## **CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of this Motion for Reimbursement of Copy Expense by electronic transmission or by placing a copy in the United States Mail with sufficient postage for first class delivery to the attorney named below.

**DONE** this the 26th day of March, 2007.

#### /s/ Daniel G. Hamm

DANIEL G. HAMM (HAM043) ATTORNEY FOR THE DEFENDANT 560 S. McDonough St., Ste. A MONTGOMERY, ALABAMA 36104 TELEPHONE 334-269-0269 FAX 334-323-5666

A. Clark Morris John T. Harmon Assistant United States Attorney Post Office Box 197 Montgomery, Alabama 36101-0197

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Invoice

Pro Legal Copies of Montgomery, Inc.

134 High Street Montgomery, Al 36104 (334) 263-0108

Federal Tax ID No.: 63-1271006

Date	Invoice #	
3/16/2007	6575	

Daniel Hamm, Esq.	
560 South McDonough Street	
Montgomery, Alabama 36104	

Ship To	
Daniel Hammn, Esq. 560 South McDonough Street Montgomery, AL 36104	

		Terms	Ship
		Net 15	3/16/2007
Quantity Item Code	Description	Price Each	Amount
10 DVD 19 CD 1 Floppy Disc Videos 23 Cass	DVD Production CD Production Copy Floppy Disc Video Duplication Copy of Audio Tape  Para Angles 3/160	20.00 5.95 3.00 12.50 5.95	200.00T 113.05T 3.00T 75.00T 136.85T
nature	3/10	Sales Tax (10.0%)	\$52.79

**Total** 

\$580.69

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Pro Legal Copies of Montgomery, Inc.

Invoice

134 High Street Montgomery, Al 36104 (334) 263-0108

Federal Tax ID No.: 63-1271006

Date	Invoice #	
3/14/2007	6549	

Bill To	Ship To
Daniel Hamm, Esq.	Daniel Hammn, Esq.
560 South McDonough Street	560 South McDonough Street
Montgomery. Alabama 36104	Montgomery, AL 36104

				Terms	Ship
				Net 15	3/9/2007
Quantity	Item Code		Description	Price Each	Amount
7,428	12	Litigation Copying  RE: US Drug Case	Pa. 7 18 2/16	0.08	594.24T
Signature			1 3/16	 s Tax (10.0%)	\$59.42

**Total** 

\$653.66